

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

GISAINET CRISTINA CHIRINOS
VILORIA,
a/k/a "Gisainet Cristina Hernandez,"

Defendant.

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: INFORMATION
24 Cr. 709 (NSR)

COUNT ONE

(Possession of Child Pornography)

The United States Attorney charges:

1. From at least in or about August 31, 2022 to in or about September 3, 2022, in Zulia, Venezuela and elsewhere, GISAINET CRISTINA CHIRINOS VILORIA, the defendant, knowingly possessed, and accessed with intent to view, a book, magazine, periodical, film, videotape, computer disk, and other material containing an image of child pornography that had been mailed, and shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and aided and abetted the same, to wit, VILORIA made sexually explicit videos and images of a prepubescent minor who had not attained 12 years of age and distributed those videos and images via the internet to another person who was located in in the Southern District of New York.

(Title 18, United States Code, Section 2252A(a)(5)(B) and (b)(2).)

FORFEITURE ALLEGATION

2. As a result of committing the offense alleged in Count One of this Information, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, any and all property, real and personal, constituting or derived from proceeds obtained, directly or indirectly, as a result of said offense; and any and all property, real or personal, that was used or intended to be used to commit or facilitate the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

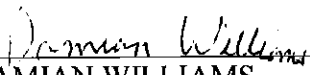
Substitute Assets Provision

3. If the above-described forfeitable property, as a result of any act or omission of the defendant:

- a) cannot be located upon the exercise of due diligence;
- b) has been transferred or sold to, or deposited with, a third person;
- c) has been placed beyond the jurisdiction of the Court;
- d) has been substantially diminished in value; or
- e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 2253;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)


DAMIAN WILLIAMS
United States Attorney